Case 3:18-cv-00426-MMD-CLB Document 137 Filed 02/1/4/20 Page 1 of 4 FILED RECEIVED **ENTERED** SERVED ON COUNSEL/PARTIES OF RECORD AARON D. FORD 1 Attorney General 2 DOUGLAS R. RANDS, Bar No. 3572 FEB 19 2820 Senior Deputy Attorney General State of Nevada 3 **Public Safety Division** CLERK US DISTRICT COURT 100 N. Carson Street 4 DISTRICT OF NEVADA Carson City, Nevada 89701-4717 BY: Tel: (775) 684-1150 DEPUTY 5 E-mail: drands@ag.nv.gov 6 Attorneys for Defendants Kim Adamson, Romeo Aranas, Veronica Austin, Renee Baker, 7 Susan Baros, Fransisco Bautista, Dwayne Baze, Ouentin Byrne. David Carpenter, Tara Carpenter, Ian Carr, Anthony Carrasco, 8 Nichole Cordova, James "Greg" Cox, Scott Davis, Russell Donnelly, James Dzurenda, Arwen Feather, Gilberto Florio-Ramirez, Sheryl Foster, Tom Garrett, Coralee Gorsline, Katherine Hegge, Desiree Hultenschmidt, William Kablitz, Alan Lima, Dominick Martucci, E.K. McDaniel, Valaree Olivas, 10 William Sandie, Richard Snyder, James Stogner, Roger Terrance, Kim Thomas, Joy Walsh, Harold Wickham and Catherine Yup 11 UNITED STATES DISTRICT COURT 12 DISTRICT OF NEVADA 13 1) RDPR. 14 JOSEPH M. ANDERSON, Case No. 3:18-cv-00426-MMD-CLB 15 Plaintiff. MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS 16 ٧. (Second Request) 17 JAMES DZURENDA, et al., 18 Defendants. 19 Defendants, Kim Adamson, Romeo Aranas, Veronica Austin, Renee Baker, Susan Baros, Francisco Bautista, Dwayne Baze, Quentin Byrne, David Carpenter, Tara Carpenter, Ian Carr, Anthony 20 Carrasco, Jeffrey Chandler, Nichole Cordova, James "Greg" Cox, Scott Davis, Russell Donnelly, James 21 Dzurenda, Arwen Feather, Gilberto Florio-Ramirez, Sheryl Foster, Tim Garrett, Coralee Gorsline, 22 Katherine Hegge, Desiree Hultenschmidt, William Kablitz, Alan Lima, Dominick Martucci, E. K. 23 McDaniel, Valaree Olivas, William Sandie, Richard Snyder, James Stogner, Roger Terance, Kim 24 Thomas, Joy Walsh, Harold Wickham and Catherine Yup, by and through counsel, Aaron D. Ford, 25 Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney General, , 26 hereby move this Court for a second extension of time to file dispositive motions. This Motion is made 27

and based upon Federal Rules of Civil Procedure 6(b)(1)(A), the attached Points and Authorities,

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the papers and pleadings on file herein, and such other and further information as this Court may deem appropriate.

MEMORANDUM OF POINTS AND AUTHORITIES

I. ARGUMENT

Defendants respectfully request an extension of time out from the current deadline (February 18, 2020) to file dispositive motions in this matter. This is the second request made in this matter. Plaintiff has filed multiple Motions to Compel discovery. (ECF Nos. 123, 124 and 125) Defense counsel submits that the Plaintiff's Motions to Compel Discovery are extensive and fact specific. Plaintiff has moved for an order to compel additional and amended responses to multiple answers to interrogatories (ECF No. 123), requests for production of documents, (ECF No. 124) and requests for admissions. (ECF No. 125). The time to respond to these motions was extensive. This Court graciously granted additional time to respond to the motions, (ECF No. 127). The responses were filed on January 16, 2020. (ECF Nos. 131, 132 and 133)

Plaintiff filed a motion for extension of time to file his replies. (ECF No. 134). The Court granted him until Friday, February 21, 2020 to file his replies. (ECF No. 136). This is after the current deadline. Because the Court's decision on these motions, and the discovery in this action may impact the proposed dispositive motion, it is requested that this Court grant the parties additional time, until March 18, 2020 to file dispositive motions.

Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

Defendants' request is timely and will not hinder or prejudice Plaintiff's case, but will allow for a thorough opportunity to brief a dispositive motion after this court decides the discovery dispute. The requested extension of time should permit the Defendants time to adequately research, draft, and submit a well briefed dispositive motion in this case. Defendants assert that the requisite good cause is present

to warrant the requested extension of time. Therefore, the Defendants request additional time, up until Thursday, March 18, 2020, to file a dispositive motion. DATED this 14th day of February, 2020. AARON D. FORD Attorney General /s/ Douglas R. Rands By: DOUGLAS R. RANDS, Bar No. 3572 Senior Deputy Attorney General Attorneys for Defendants IS, SO, ORDERED DATED: 2/19/2020